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International Specialists in the Environment

1999 Bryan Street  
Dallas Texas 75201  
Tel (214) 220 0318 Fax (214) 855 1422

## MEMORANDUM

**TO** Chris Petersen, DPO  
EPA Region 6

**THRU** Chris Quina, TATL  
Region 6 Technical Assistance Team

**FROM** Steven Cowan *SC*  
Region 6 Technical Assistance Team

**DATE** August 16, 1994

**REF** TAT Contract Number 68-WO-0037  
TDD # T06-9405-905  
PAN # E06Z170VAA

**SUBJECT** Narrative Summary  
Woodward Industries,  
Nacodoches, Nacodoches County, TX  
CERCLIS # TXD026868323

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## INTRODUCTION

The Region 6 Technical Assistance Team (TAT) was tasked by the U S Environmental Protection Agency (EPA) to review the existing EPA Region 6 CERCLIS file for Woodward Industries so a final decision can be made by EPA as to the site's current CERCLIS status. From the file review relevant Hazard Ranking System (HRS) data was collected, and the site was found to be an active facility and RCRA Non-filer. Based on the file review, the EPA will make the decision to either conduct further remedial action or to assign the classification of No Further Remedial Action Planned (NFRAP) for the site. This memorandum will briefly describe the information obtained from the file for the Woodward Industries site.

## SITE HISTORY AND DESCRIPTION

The Woodward Industries site, which is located in Nacodoches, Texas, is an active, 7-acre, wood treating facility. The site includes four subsurface soaking vats, an above ground storage vat, eight drums, a 2,000 gallon cylindrical storage tank, an unlined pit and soil stains to depths of 20 feet. Pentachlorophenol was found in the soils at 2.4 ppm and 1.6 ppm and in the on-site pit at 18 ppm. No other contaminants were found at the site. A private drinking water well ¼ mile from the site was sampled. No pentachlorophenol or other organics were detected in the ground water sample. The Site Inspection noted the Texas Water Commission (TWC) was helping with the site's closure in 1986.

## **REGULATORY STATUS OF SITE**

The site is a RCRA Non-filer. A Site Inspection was conducted by the TWC in 1986. The TWC - RCRA files indicated the wastes were disposed of prior to RCRA regulations. In 1988, the TWC proposed that a Hazard Ranking Score (HRS) package be prepared for the site.

## **RELEVANT HRS DATA**

The sources at the site are an unlined pit, four subsurface soaking vats, an above ground vat, eight drums, a 2,000 gallon cylindrical storage tank and stained soils. Only pentachlorophenol was found in the soils and the pit samples.

Ground water is used for drinking water within the target distance limit of the Ground Water Migration Pathway. Two private drinking water wells are located 0.3 and 0.25 miles from the site. However, no contaminants were found in the drinking water well ¼ mile from the site.

Drainage from the site flows into Bonita Creek which is a tributary of the Neches River. The Neches River may be used for recreation and fishing, however, it is not known if the Neches River is within the Surface Water Pathway's target distance limit.

Target information is not known for the Soil Exposure Pathway.

The site is located outside of town and lacks a substantial number of targets (150 individuals within 2 miles of the site) for the Air Migration Pathway.